

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Midland Funding, LLC,)	CASE NO.: 3:08-cv-01434
)	
Plaintiff,)	HON. DAVID A. KATZ
)	
vs.)	
)	
Andrea Brent,)	
)	
Defendant,)	
)	
vs.)	
)	
Midland Credit Management, Inc.,)	
)	
Counterclaim Defendant.)	
)	

**MIDLAND FUNDING, LLC AND MIDLAND CREDIT MANAGEMENT, INC.'S
MOTION TO EXCEED PAGE LIMITATIONS**

Now comes Plaintiff Midland Funding LLC (“Midland”), and Third-Party Defendant Midland Credit Management, Inc. (“MCM”), by and through undersigned counsel, and pursuant to Local Rule of Civil Procedure 7.1(f), requests that this Court permit them to file a memorandum in Opposition To Brent’s Motion To File A Third-Amended Counterclaim which exceeds the fifteen page limitation set forth by the local rules. Midland and MCM will file a memorandum in support no longer than 20 pages in length. This request is being made for the followings reasons:

- Local Rule 7.1 sets a 15 page limitation for any memorandum in support of a non-dispositive motion, and prior approval to exceed such limitation for good cause.

- This is a complex case involving novel propositions of law and fact, deserving extended discussion.
- Midland and MCM will be filing a joint motion. As such, each party is inherently giving up the right to file its own motion, such that the actual motion filed is more logically sequenced, and will absolve the need to make reference to each other's motion. By doing so, the parties are effectively reducing their page limitations from a combined 30 pages, to 20 pages.

WHEREFORE, Midland and MCM respectfully pray that they be permitted to file their Opposition To Brent's Motion To File A Third-Amended Counterclaim, with a memorandum in support to not exceed twenty pages.

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ Theodore W. Seitz

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December 28, 2009

PROOF OF SERVICE

I hereby certify that on December 28, 2009 a copy of the foregoing was filed electronically in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to parties by operation of the court's electronic filing system

/s/ Theodore W. Seitz
Theodore W. Seitz